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JUNE 13, 2018

VIA CM/ECF

Hon. Gregory H. Woods, U.S.D.J.
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street, Room 2260
New York, New York 10007

Re: Michael Grecco Prods., Inc. v. BuzzFeed, Inc., Case No. 18 Civ. 02232 (GHW) (SDA)

Dear Judge Woods:

We represent defendant BuzzFeed, Inc. ("Defendant") in the above-captioned action. We write with the consent of plaintiff Michael Grecco Productions, Inc. ("Plaintiff") to jointly request that Your Honor refer this case to mediation before Magistrate Judge Aaron in order to explore the possibility of an early resolution of this case.

If the instant request for mediation is granted, the parties would both prefer to conserve resources by focusing their efforts on settlement, rather than litigation. Accordingly, pursuant to Your Honor's comments during the Initial Pretrial Conference on June 7, 2018, the parties also respectfully request that Your Honor enter an order adjourning all discovery and motion-related deadlines during the pendency of any mediation.

We are grateful for Your Honor's attention to this matter.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'EML', with a stylized flourish at the end.

Eleanor M. Lackman

cc: All Counsel of Record (via CM/ECF)